

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO
ALL CASES

MDL No. 2875

Civil No. 19-2875 (RBK-JS)

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
NORTHWIND PHARMACEUTICALS, LLC**

WHEREAS the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs (“VCDs”);

WHEREAS Northwind Pharmaceuticals, LLC having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and Northwind Pharmaceuticals, LLC that all current cases pending and all future cases to be filed in this MDL alleging claims against Northwind Pharmaceuticals, LLC in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ Marlene J. Goldenberg
Marlene J. Goldenberg
Goldenberg Law, PLLC
800 LaSalle Avenue
Suite 2150
Minneapolis, MN 55402

On behalf of Plaintiffs' Executive Committee

/s/ Nicole D. Galli
Nicole D. Galli
Law Offices of N.D. Galli LLC
2 Penn Center Plaza, Suite 910
1500 JFK Blvd
Philadelphia, PA 19102

On behalf of Peripheral Defendant
Northwind Pharmaceuticals, LLC

Dated: December 13, 2019

Dated: December 13, 2019